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5 Attorney for Plaintiff

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7 **UNITED STATES DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 HELEN ARMSTRONG

10 Plaintiff,

11 v.

12 TERRY REYNOLDS, in his individual capacity  
13 and as Deputy Director of Nevada division of  
Business and Industry; STEVE GEORGE, in his  
14 individual capacity and as an administrator of the  
Nevada Division of Industrial Relations; JESS  
15 LANKFORD, in his individual capacity and as  
Chief Administrative Officer of Nevada OSHA;  
16 and LARA PELLEGRINI, in her individual  
capacity and as Whistleblower Chief Investigator  
17 of Nevada OSHA, DOES I through X, unknown  
18 individuals, and ROES XI through XX, entities,  
19 government agencies, corporations, or other  
companies and/or businesses currently unknown;

20  
21 Defendants.

Case No.: 2:17-cv-02528

**STIPULATION AND ORDER TO**  
**CONTINUE DATE TO RESPOND TO**  
**DEFENDANTS' OPPOSITION TO**  
**MOTION TO AMEND COMPLAINT**

**[#50]**

**(First Request)**

(Oral Argument Requested)

22 IT IS HEREBY STIPULATED AND AGREED between Defendants TERRY REYNOLDS,  
23 Deputy Director of Nevada division of Business and Industry; STEVE GEORGE, Administrator of  
24 the Nevada Division of Industrial Relations; JESS LANKFORD, Chief Administrative Officer of  
25 Nevada OSHA; and LARA PELLEGRINI, Whistleblower Chief Investigator of Nevada OSHA, by  
26 and through their counsel, Adam Paul Laxalt, Attorney General, and Deputy Attorney General  
27 Vivienne Rakowsky, and Plaintiff HELEN ARMSTRONG, by and through her counsel, Joel F.  
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1 Hansen of Cooper Levenson, P.A., that the parties stipulate that Plaintiff shall have until March 16,  
2 2018 to respond to Defendants' Opposition to Motion to Amend Complaint.

3 Parties are requesting that this motion be scheduled for oral argument.

4 Good cause exists to extend the date for the Plaintiff's response to Defendants' Opposition to  
5 Motion to Amend Complaint (ECF No. 50).

6 This Stipulation is entered into this 2nd day of March, 2018.

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8 COOPER LEVENSON, P.A.

ADAM PAUL LAXALT, *Attorney General*

9 /s/ Joel F. Hansen

/s/ Vivienne Rakowsky

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11 JOEL F. HANSEN, ESQ.  
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15 *Attorneys for Plaintiff*

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VIVIENNE RAKOWSKY, DAG  
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555 E. Washington Ave., Ste. 3900  
Las Vegas, NV 89101  
*Attorneys for Defendants*

14 **ORDER**

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16 IT IS SO ORDERED.

17 DATED: March 6, 2018

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21 C.W. HOFFMAN, JR.  
22 UNITED STATES MAGISTRATE JUDGE  
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